Citizens for Balanced Use

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To whom it may concern,

The Bison Relocation analysis is filled with assumptions, theories, and predictions. The true cost analysis is incomplete. The Spotted Dog area was purchased to be used for expansion of Elk habitat and hunting opportunities. The Indian Reservations where bison have been released have been plagued with management and administrative problems. The containment, environmental damage to streams and wetlands, and the diseases (anthrax and brucellosis) have greatly affected game herds and land on property such as Ted Turner's property south of Bozeman.

The FWP has not been completely forthcoming in the impact of bison, both in the environmental and economical consequences. CBU requests the release of all information from Turner's ranch as to the problems he has had with this animal. He took public bison from Yellowstone Park to hold until the State could affectively find other areas to relocate them. The public should be informed as to how these bison affected the landscape. What was the cost to manage these animals on the Turner Ranch? What do neighboring property owners have to say about the affect these bison have on their ranches and property?

These are just a few of the questions needed to be answered before further relocation attempts are made by FWP.

The following statement in the Quarantine Study Protocols states a disease plan will be developed. The September 20, 2011 Addendum has no mention of the cost to develop such a plan which in all reality will need to be done. What is the cost of developing such a plan and also what results could an outbreak of disease cost? What would be the response time to a disease outbreak if in fact the disease plan was not developed or in place before introduction of diseased bison? CBU request these questions to be answered before any decision is made to relocate Park bison to other areas around Montana.

"Should serologically positive animals be detected in 2012 or subsequent years, the positives will be sacrificed, necropsied, and specimens collected for culture. If brucellosis infection is confirmed, whole-herd testing will be necessary. With results of the whole herd test, a disease management plan will be developed in cooperation with the State Veterinarian's office and APHIS epidemiologists. Depending on testing results, the disease management plan may consist of vaccination and rigorous test and slaughter, to whole herd depopulation."

The following statement in the Quarantine Study Protocols does not mention or reference additional bison being released in these areas. Any additional bison brought in to these areas would surely put at risk the original animals and therefore to suggest a 5 years testing limit is not factual or feasible. CBU requests this statement and sunset time be further evaluated. A more reasonable time appropriation would be an infinite time of testing and quarantine for any of these herds. This amounts to further cost which were not part of the September 20, 2011 Addendum.

"It is anticipated that if the translocated herds remain seronegative for 5 years following quarantine, continued regular monitoring would not be required as a condition of the Quarantine Feasibility Study".

The September 20, 2011 Addendum does not accurately asses the cost of fencing. The amount specified of 3 dollars per foot is grossly underestimated. The cost of water facilities in this document is also well below what it will cost.

I believe the FWP has intentionally left out many possible consequences of expanding the range of bison to other parts of the state. When talking with the director of FWP more that 2 years ago he assured me that bison would be relocated throughout Montana. The FWP has continued to push for expansion of bison. Even the current Governor boasted of his plan at a past legislature EQC meeting on March 17th, 2006 where he was going to take private property from ranchers west and north of Yellowstone Park. His statement at this meeting was that taking this land for bison was no different than taking land for a power line or pipeline. It would be mandatory that ranchers give up their property.

There should be no doubt in anyone's mind that the agenda of both the Governor and his administrative staff at FWP have an agenda of bison range expansion no matter the cost to taxpayers and property owners. This agenda along with this administration's lack of concern about overpopulation of wolves will ultimately be the demise of Montana's number one economic driver, agriculture.

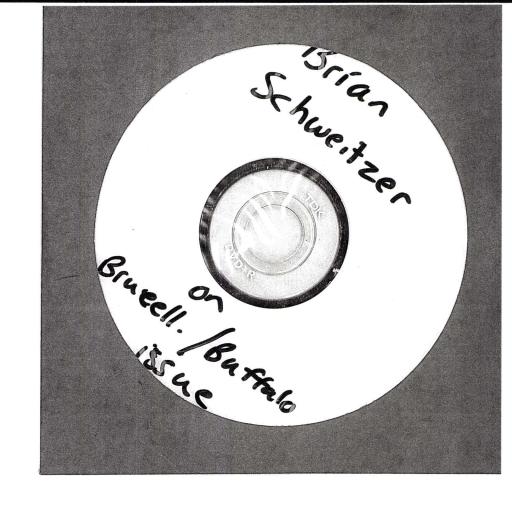
The Bison Relocation Environmental Assessment is incomplete, deceptive in nature, and in many cases uses selective science and false cost analysis in order to sell the public on what amounts to simply a bad idea. The recent public hearings that have been held should be a strong message to FWP that the introduced bison to Yellowstone Park should not be relocated to any area outside the Park. The September 20, 2011 Addendum clearly states "if there is a finding during the public comment period". This statement is clear and the FWP must admit that private property owners near these areas of proposed release have voiced strong opposition to bison relocation and these private property owners will be adversely affected.

Last winter the bison located near the Circle area escaped their containment facility and greatly affected neighboring property. These animals where hazed in an attempt to get them to return to the containment with not total success. At least one animal was killed and damage to private property was never compensated for. The current EA does not address compensation for bison impacts to private property in the event they escape.

Because legislature has the ability to fund or defund programs there is never a sure guarantee that compensation and funding for any issues regarding bison expansion in Montana would be constant and predictable. Look at the compensation funding by Defenders of Wildlife for impacts to ranchers from wolf introduction. This group no longer contributes to this compensation fund and it is now left up to the taxpayers of Montana with some coming from the Federal Government. Keep in mind the money from the Federal Government comes with several strings attached through regulations, restrictions and requirements.

CBU is opposed to any expansion, relocation or introduction of bison to any area of Montana outside Yellowstone National Park and the current Bison Range area in Eastern Montana.

Sincerely, Kerry White Executive Board Citizens for Balanced Use



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